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UNITED STATES BANKRUPTCY COURT
OF THE CENTRAL DISTRICT OF CALIFORNIA—SANTA ANA DIV.

Bankruptcy Case No. 8:24-bk-12674-SC
Chapter 11

In re

The Original Mowbray's
Tree Service, Inc.,

Debtor.

**REPLY OF MOVANT DEBRA DANNER, TO
DEBTOR'S LIMITED OPPOSITION TO
MOVANT'S NOTICE OF MOTION AND
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY UNDER 11 U.S.C. § 362
(ACTION IN NONBANKRUPTCY FORUM)**

Date: August 20, 2025

Time: 1:30 p.m.

Place: Courtroom 5C, **by Zoom.gov** (check judge
Clarkson's calendar, posted on court website,
www.cacb.uscourts.gov, for codes to zoom in to this
hearing), or appear in person at Courtroom 5C, 411
West Fourth Street, Santa Ana, CA 92701

To the Court, to Debtor, and to all additional parties in interest:

Movant Debra Danner REPLIES as follows to Debtor Mowbray's "Limited
Opposition" [dkt.659, filed 8/6/25] to Danner's RFStay Motion [dkt.585, filed
7/24/25]: Danner notes the Debtor's "Limited Opposition" **does not object** to
Danner's RFStay motion being granted, and only requests that the RFStay Order state:

"This order is without prejudice to the Debtor's rights, defenses,
arguments, and objections in all respects as to any matter other

1 than stay relief under 11 U.S.C. § 362(d)(1) and the waiver of the
2 14-day stay under Fed. R. Bankr. Pro. 4001(a)(3).”

3 Danner’s FRStay Motion does not suggest that Mowbray’s cannot defend, in the non-
4 bankruptcy forum, and therefore Danner does not object to debtor’s requested
5 language being added to the RFStay Order.
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9 Dated: August 13, 2025

THE BANKRUPTCY LAW FIRM PC

10 /s/ Kathleen P. March

11 By Kathleen P. March, Esq., attorneys for
12 Movant Debra Renee Danner on Danner’s
13 RFStay Motion and Related Motion
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10524 W. Pico Blvd., Ste. 212, Los Angeles, CA 90064

A true and correct copy of the foregoing document entitled (*specify*): REPLY OF MOVANT DEBRA DANNER, TO DEBTOR'S LIMITED OPPOSITION TO MOVANT'S NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (ACTION IN NONBANKRUPTCY FORUM) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 8/13/25, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Attorneys for Debtor:

- **Robert S Marticello** rmarticello@raineslaw.com, bclark@raineslaw.com;csantiago@raineslaw.com
- **Michael Simon** msimon@raineslaw.com, bclark@raineslaw.com;csantiago@raineslaw.com

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 8/13/25, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 8/13/25, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

BY UPS Overnight:

Hon. Judge Scott C. Clarkson
U.S. Bankruptcy Court, Ronald Reagan Federal Building
411 West Fourth Street
Suite 5130
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

8/13/25

Date

Kathleen P. March, Esq.

Printed Name

/s/ Kathleen P. March

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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